REMARKS

Claims 21-36 are currently pending in the present application. Reconsideration of the application in its present form is requested.

In the Office Action, the Examiner has rejected claims 21-36 under 35 U.S.C. 103(a), as being unpatentable over U.S. Patent Application No. US2003/0014500 to Schleiss et al. in view of U.S. Patent No. 5,946,210 to Montminy et al. For at least the reasons set forth below, Applicant traverses this rejection

The Schleiss et al. application discloses an enterprise 10 having a communications system for communicating transactional data (e.g. alarms) between a process control system 36 and a plurality of information technology systems 30-48 using input and output XML schemas. **The Schleiss et al. application is not concerned with and does not describe a method of controlling a machine operable to manufacture a device, let alone an electrical device.** Thus, the Schleiss et al. application does not come close to showing or suggesting the steps of the claimed methods. Most of the provisions of the Schleiss et al. application cited by the Examiner as showing steps in the claimed methods are at best only remotely related to the claimed steps and then, only in a general manner. Moreover, the cited provisions of the Schleiss et al. application are not interconnected as required by the claims.

A few of the steps of the claimed methods that are not shown or suggested by the Schleiss et al. application are discussed below.

1. "providing a store of design data for electrical devices" recited in independent claim 21

   "providing a design data server for storing and providing access to design data for electrical devices" , which is recited in independent claim 30

The Examiner cites Fig. 1 (item 36) of the Schleiss et al. application as showing the foregoing steps of independent claims 21 and 30, respectively. Item 36 in Fig. 1 is

labeled "PROCESS/PRODUCTION CONTROL" and corresponds to the process control system 36 described in the specification. The label "PROCESS/PRODUCTION CONTROL" manifestly does not disclose providing a design store or design data server and the process control system 36 is not disclosed as having a design store or design data store. Thus, the provision of the Schleiss et al. application cited by the Examiner as showing the foregoing steps does not in fact do so.

2. "producing a list of electrical devices that need to be manufactured based on said information retrieved from said store of transactional data;
selecting from said list a particular electrical device that needs to be manufactured by said at least one machine", which is recited in independent claim 21.

The Examiner cites Fig. 1 (items 30, 38, 44 and 48) and paragraphs [0004]-[0006] of the Schleiss et al. application as showing the foregoing steps of independent claim 21. In Fig. 1, items 30, 38, 44 and 48 are labeled "ORDER PROCESSING", "PRODUCT INVENTORY CONTROL", "PROCUREMENT" and "PRODUCTION SCHEDULING" and are merely shown being individually connected to a line 50 (LAN 50). Thus, it is manifestly clear that Fig. 1 does not show the foregoing steps of claim 21. With regard to paragraphs [004]-[006], the most relevant disclosure is ordering additional parts from a supplier in response to receiving a customer order (paragraph 5), which falls far short of showing the foregoing steps of claim 21. Thus, the provisions of the Schleiss et al. application cited by the Examiner as showing the foregoing steps of claim 21 do not in fact do so.

3. "updating said store of transactional data to reflect said received real-time information" [concerning the manufacture of an electrical device], which is recited in independent claim 21.

The Examiner cites paragraphs [0006], [0023], [0035], [0038] and [0054] of the Schleiss et al. application as showing the foregoing step of independent claim 21. The cited paragraphs only generally discuss the communication of transactional data (e.g. alarms) between the various systems of the enterprise 10. None of these paragraphs specifically disclose updating a store of transactional data to reflect real-time data about the manufacture of a device. Thus, the provisions of the Schleiss et al. application cited by the Examiner as showing the foregoing step of claim 21 do not in fact do so.

4. "determining from said retrieved information whether said facility can manufacture said particular electrical device", which is recited in independent claim 30

The Examiner cites Fig. 1 (items 30, 38, 44 and 48) and paragraphs [0004]-[0006] of the Schleiss et al. application as showing the foregoing step of independent claim 30. In Fig. 1, items 30, 38, 44 and 48 are labeled "ORDER PROCESSING", "PRODUCT INVENTORY CONTROL", "PROCUREMENT" and "PRODUCTION SCHEDULING" and are merely shown being individually connected to a line 50 (LAN 50). Thus, it is manifestly clear that Fig. 1 does not show the foregoing step of claim 30. Once again, the most relevant portion of paragraphs [0004]-[0006] is ordering additional parts from a supplier in response to receiving a customer order (paragraph 5), which also falls far short of showing the foregoing step of claim 30. Thus, the provisions of the Schleiss et al. application cited by the Examiner as showing the foregoing step of claim 30 do not in fact do so.

From the foregoing, it is clear that the Schleiss et al. application does not show what is attributed to it by the Examiner and does not even remotely suggest independent claims 21 and 30 and, thus, dependent claims 22-29 and 31-36.

The Montminy et al. patent discloses an automated system and method for

designing power converters. The method includes receiving power converter operating characteristic information, and, in a computer, determining alternative power converter configurations that are consistent with the operating characteristic information. The Montminy et al. patent fails to cure a number of the deficiencies of the Schleiss et al. application. For example, with regard to the deficiencies described above, the Montminy et al. patent fails to show or suggest:

> "updating said store of transactional data to reflect said received real-time information" [concerning the manufacture of an electrical device], which is recited in independent claim 21; and
>
> "determining from said retrieved information whether said facility can manufacture said particular electrical device", which is recited in independent claim 30

Thus, Applicant submits that independent claims 21 and 30 and, thus, dependent claims 22-29 and 31-36 are patentable over the Schleiss et al. application and the Montminy et al. patent, individually, or in combination.

Based on the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 050877.

Respectfully submitted,

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